

## **EXHIBIT 3**

## Teny Geragos

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**From:** Kathleen E. Cassidy [REDACTED]  
**Sent:** Tuesday, August 07, 2018 7:42 PM  
**To:** Hajjar, Tanya (USANYE); Penza, Moira Kim (USANYE)  
**Cc:** Marc Agnifilo; Teny Geragos; Sean.Buckley [REDACTED] Susan Necheles;  
hector.diaz [REDACTED] david; William.McGovern [REDACTED] pau [REDACTED];  
David Stern; james.burke [REDACTED]; wp [REDACTED]  
**Subject:** RE: US v. Raniere et al -- meet and confer  
**Attachments:** 2018.08.07 Letter to Govt re M&C and ESI v2.pdf

Moira and Tanya:

Please see the attached correspondence.

Thanks,  
Kate

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Kate Cassidy  
Hafetz & Necheles LLP

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**From:** Hajjar, Tanya (USANYE) <[REDACTED]>  
**Sent:** Thursday, August 02, 2018 10:11 AM  
**To:** David Stern <[REDACTED]>; William.McGovern [REDACTED]  
**Cc:** Penza, Moira Kim (USANYE) <[REDACTED]>; Marc Agnifilo <[REDACTED]>; Kathleen E. Cassidy  
<[REDACTED]>; Teny Geragos [REDACTED]; Sean.Buckley [REDACTED] Susan  
Necheles [REDACTED]; hector.diaz [REDACTED] david <[REDACTED]>; pau [REDACTED]  
**Subject:** RE: US v. Raniere et al -- meet and confer

All – As we've said before, we believe it will be more productive and practical to meet and confer to address issues relating to discovery, should that prove necessary, after some productions of discovery have gone out to you. We will be calling some of you individually to discuss issues that may be unique to your clients in coming weeks, and, as always, we welcome specific questions or requests at any time.

Thanks,  
Tanya

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**From:** David Stern [REDACTED]  
**Sent:** Thursday, August 2, 2018 8:43 AM  
**To:** [William.McGovern](#) [REDACTED]  
**Cc:** Penza, Moira Kim (USANYE) [REDACTED]; Marc Agnifilo [REDACTED]; Kathleen E. Cassidy  
[REDACTED]; Hajjar, Tanya (USANYE) [REDACTED]; Teny Geragos  
[REDACTED]; [Sean.Buckley](#) [REDACTED] Susan Necheles [REDACTED];  
[hector.diaz](#) [REDACTED] david [REDACTED]; [pau](#) [REDACTED]  
**Subject:** Re: US v. Raniere et al -- meet and confer

Either is fine for me.

David Stern, Esq.  
Rothman, Schneider, Soloway & Stern, LLP

On Aug 1, 2018, at 6:19 PM, "[William](#)" > wrote:

Dear Moira and Tanya:

Now that all counsel have signed the protective order and assuming we receive additional discovery this week we should try to hold a date on the calendar for next week for the meet and confer. Given the number of participants and summer schedules we don't want to risk letting it slip any further into August. We are also cognizant that Judge Garaufis is holding the week of August 20 for us to address any outstanding issues not resolved during the meet and confer.

How about Monday afternoon or Tuesday morning?

Bill

William F. McGovern

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**From:** Penza, Moira Kim (USANYE) >  
**Sent:** Thursday, July 26, 2018 4:47 PM  
**To:** Marc Agnifilo >; Kathleen E. Cassidy >  
**Cc:** Hajjar, Tanya (USANYE) >; Teny Geragos >; William McGovern >; Sean S. Buckley >; Susan Necheles >; [hector.diaz](#) >; david >  
**Subject:** RE: US v. Raniere et al -- meet and confer

Marc/Kathleen,

Thank you for your emails. The first step is to have the new defendants sign the protective orders, which we will send to them tomorrow. We will begin producing discovery to all defendants next week and if a meet and confer is necessary at some point in the near future we'll be available. In the interim, you are certainly invited to send us a list of information you are seeking to gather.

Best,  
Moira

**Moira Kim Penza** | Assistant United States Attorney  
**U.S. Attorney's Office, EDNY**  
271 Cadman Plaza East | Brooklyn, NY 11201

[REDACTED] | [REDACTED]  
[REDACTED]

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**From:** Marc Agnifilo [REDACTED]  
**Sent:** Thursday, July 26, 2018 4:42 PM  
**To:** Kathleen E. Cassidy [REDACTED]  
**Cc:** Penza, Moira Kim (USANYE) [REDACTED]; Hajjar, Tanya (USANYE)

[REDACTED]; Teny Geragos [REDACTED]; [REDACTED]  
[REDACTED] Susan Necheles [REDACTED]  
[REDACTED]

**Subject:** Re: US v. Raniere et al -- meet and confer

Since we have both out of town lawyers tomorrow in court tomorrow, can we lock in the meet and confer discussed in open court for after our appearances tomorrow. Thanks. Marc

Sent from my iPhone

On Jul 26, 2018, at 10:09 AM, Kathleen E. Cassidy <[REDACTED]> wrote:

Moira and Tanya:

Given that a number of lawyers will be in Court tomorrow morning and that Hector Diaz (Lauren Salzman's counsel) will still be in town from Arizona, would you be available to do the meet and confer on discovery tomorrow after the court appearances are concluded? If so, we will send you a list later today of what information defendants hope to gather from the meet and confer.

Thank you,  
Kate

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[REDACTED]  
[REDACTED]